

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA
3 TAMMY COVINGTON and
4 JEFFREY COVINGTON,
5 Plaintiffs,
6 -vs- Case No. 19-cv-00718-PRW
7 CSAA FIRE AND CASUALTY
8 INSURANCE, d/b/a AAA FIRE AND
9 CASUALTY INSURANCE COMPANY,
10 INC.,
11 Defendant.

12 DEPOSITION OF ALANA HARE
13 TAKEN ON BEHALF OF THE PLAINTIFFS
14 ON AUGUST 19, 2020, BEGINNING AT 1:04 P.M.
15 IN OKLAHOMA CITY, OKLAHOMA

16
17 APPEARANCES:

18 On behalf of the PLAINTIFFS:

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24 (Appearances continued on next page)

25 REPORTED BY: MARCY A. KING, CSR, RPR

1 A Yes.

2 Q And it excludes constant or repeated
3 seepage or leakage as stated in here, okay? I'm
4 not going to repeat it every time.

5 A Right. Yeah.

6 Q "Unless that seepage is unknown to all
7 insureds and is hidden beneath the floors," right?

8 A Correct.

9 Q So -- so is it fair to say that the
10 exclusion doesn't apply if that leakage or water
11 is unknown to all insureds and is hidden beneath
12 the floors?

13 A Correct.

14 Q Okay. So if the moisture that caused
15 the damages is unknown to Jeffrey and Mrs.
16 Covington, and was hidden beneath the floors, then
17 this exclusion for constant or repeated seepage
18 doesn't apply; is that fair?

19 A Yes.

20 Q Does AAA have any evidence that the
21 Covingtons had any knowledge of water on the
22 floors or under the floors other than the one day
23 that Jeffrey Covington said that he saw it and
24 cleaned it up?

25 A No.

1 Q Does AAA have any evidence that the
2 Covingtons had knowledge of condensation or water
3 under the floors at any time?

4 A No.

5 Q Does AAA have any evidence that the
6 water or condensation that AAA has talked about in
7 its denial was, in fact, not hidden beneath the
8 floors?

9 A It wasn't hidden beneath the floors.

10 Q I'm sorry?

11 A It was not hidden beneath the floors?

12 Q That's what you're saying?

13 A Yeah. It was visible on the day that
14 Mr. Covington cleaned it up. That would be not
15 hidden under the floors.

16 Q Right. The water that was visible he
17 cleaned up, right?

18 A To the best of his ability, yes.

19 Q Right. And any other water that was
20 there was hidden, correct?

21 A Still present, though.

22 Q Okay. I'm not saying it's not present;
23 I'm saying it was hidden.

24 A But I can't separate the two. I guess
25 in my brain I don't separate the two. It's all